

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

AMANDA BOARDMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GREEN DOT CORPORATION

Defendant.

Case No.: 3:21-cv-00174-FDW-DSC

Hon. Judge Frank D. Whitney

CLASS ACTION

**FILED UNDER SEAL PURSUANT
TO COURT ORDER**

PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Plaintiff Amanda Boardman, pursuant to Local Civil Rule 7.1 and Federal Rule of Civil Procedure 23, hereby moves this Court for an Order certifying this action as a class action for all purposes of liability and relief under Federal Rule of Civil Procedure 23, and certifying the proposed Class and Subclass defined in the accompanying Memorandum of Law in Support of Class Certification; appointing Plaintiff as representatives of the Class and Subclass; and appointing Plaintiff's counsel as counsel for the Class and Subclass. In accordance with Local Rule 7.1(B), Plaintiff made good faith efforts to avoid and/or narrow the necessity for this motion by conferring with and requesting that Defendant consent to class certification. However, Defendant has indicated that it intends to oppose this motion.

A proposed Order is attached.

WHEREFORE, for the reason set forth in the memorandum and other supporting papers, and any other reasons that may later be made apparent and/or addressed at any oral argument on the motion, Plaintiff respectfully requests that this Court enter an order (1) certifying this case as a class action and certifying the proposed Class and Subclass as defined in the attach

memorandum; (2) appointing Plaintiff as representative of the Class and Subclass; and (3) appointing Plaintiff's counsel as counsel for the Class and Subclass.

Date: March 30, 2022

Respectfully submitted,

Ignacio Hiraldo, Esq. IJhiraldo@Hiraldolaw.com IJH Law 1200 Brickell Ave. Suite 1950 Miami, FL 33131 E: IJhiraldo@IJhlaw.com T: 786-496-4469 <i>Pro Hac Vice</i>	<u>/s/ Manuel S. Hiraldo</u> Manuel S. Hiraldo, Esq. HIRALDO P.A. Florida Bar No. 030380 401 E. Las Olas Blvd., Suite 1400 Fort Lauderdale, FL 33301 t. 954-400-4713 e. mhiraldo@hiraldolaw.com <i>Pro Hac Vice</i>
<u>/s/ David M. Wilkerson</u> David M. Wilkerson, Esq. NC State Bar No. 35742 The Van Winkle Law Firm 11 N. Market Street Asheville, North Carolina 28801 (828)258-299 (phone) (828)257-2767 (fax) dwilkerson@vwlawfirm.com	

Attorneys for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

The undersigned certifies that on March 30, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Manuel S. Hiraldo
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